

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

OSIRIUS GROUP, LLC, a Delaware
limited liability company,

Plaintiff,

v.

Case No. 23-cv-10943
Hon. Denise Page Hood

IDEANOMICS, INC., a Nevada
Corporation,

Defendant.

MILLER, CANFIELD, PADDOCK
AND STONE, P.L.C.

Gerald J. Gleeson II (P53568)
Sydney G. Rohlicek (P85655)
840 W. Long Lake Rd., Suite 150
Troy, Michigan 48098
(248) 879-2000
Attorneys for Plaintiff

Kurt A. O'Keefe (P30718)
1254 Woodbridge Street
Saint Clair Shores, MI 48080
(313) 962-4630
koklaw@gmail.com
Attorney for Defendant

**PLAINTIFF'S MOTION FOR IMMEDIATE CONSIDERATION OF
PLAINTIFF'S MOTION FOR APPOINTMENT OF CHARLES D.
BULLOCK AS RECEIVER**

Plaintiff Osirius Group, LLC, ("Osirius") by and through its attorneys, Miller, Canfield, Paddock and Stone, PLC, moves this Court for immediate consideration of Plaintiff's Motion for Appointment of Charles D. Bullock as Receiver. *See* ECF No. 90. The grounds for this motion are more fully articulated in the attached brief.

Pursuant to Local Rule 7.1, counsel for Osirius sought concurrence from Defendant's counsel via email on August 1, 2024, which was denied, making this motion necessary.

WHEREFORE, Plaintiff Osirius Group, LLC respectfully moves this Court for immediate consideration of its Motion, or at a minimum, for an expedited ruling on the Motion.

Respectfully submitted,

By: /s/ Gerald J. Gleeson, II

Gerald J. Gleeson II (P53568)

Sydney G. Rohlicek (P85655)

Miller, Canfield, Paddock, and Stone, PLC
840 W. Long Lake Rd., Suite 150

Troy, MI 48098

(248) 879-2000

gleeson@millercanfield.com

rohlicek@millercanfield.com

Attorneys for Plaintiff

Dated: August 2, 2024

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**BRIEF IN SUPPORT OF PLAINTIFF'S MOTION FOR IMMEDIATE
CONSIDERATION OF PLAINTIFF'S MOTION FOR APPOINTMENT OF
CHARLES D. BULLOCK AS RECEIVER**

ARGUMENT

An expedited ruling on Plaintiff's Motion for Appointment of Charles D. Bullock is necessary to prevent Ideanomics' from further violating the Court's injunction and to preserve the little remaining assets it has. The Court entered Judgment against Ideanomics on August 22, 2023 in the amount of \$2,615,095.50 plus costs and attorney's fees in the amount of \$53,371.80—not including interest that continues to accrue.

In lieu of satisfying the ever growing debt, Ideanomics has only offered broken promises of payment. As is evident from Ideanomics' public SEC filings, the Company continues to conduct itself without regard for this Court's October 10, 2023 Order instructing Ideanomics that it "shall not dispose of, conceal, secret, sell, assign convey, mortgage, or otherwise transfer Property ... or any interest therein ... until further direction of the Court." (ECF No. 38, PageID.544). Instead, Ideanomics has sold its shares in a third-party company for \$4,000,000, sold nearly \$4,000,000 in convertible debentures, and received nearly \$4,000,000 in advances on a promissory note – all while the Default Judgment remains pending and accruing interest.

This Court has already authorized the appointment of a receiver and Osirius has submitted Charles D. Bullock for this Court's consideration. To protect the

further dilution of Ideanomics' assets, Osirius now respectfully moves this Court to issue an expedited ruling on the Motion [ECF No. 90].

Respectfully submitted,

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Sydney G. Rohlicek (P85655)

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840 W. Long Lake Rd., Ste. 150

Troy, MI 48098

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gleeson@millercanfield.com

rohlicek@millercanfield.com

Attorneys for Plaintiff

Dated: August 2, 2024

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2024, I electronically filed the foregoing document, with the Clerk of the court using the ECF system which sent notification of such filing all counsel of record.

Respectfully submitted,

By: /s/ Gerald J. Gleeson, II
Gerald J. Gleeson II (P53568)
Sydney G. Rohlicek (P85655)
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Troy, MI 48098
(248) 879-2000
gleeson@millercanfield.com
rohlicek@millercanfield.com
Attorneys for Plaintiff